

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NO. 1:21 CV 00305-MR-WCM**

BRO T. HESED-EL,	)	
	)	
Plaintiff,	)	<b>DEFENDANTS ROBIN BRYSON,</b>
	)	<b>MISSION HOSPITAL, INC. AND</b>
vs.	)	<b>ANC HEALTHCARE, INC.’S</b>
	)	<b>RESPONSE TO PLAINTIFF’S</b>
	)	<b>MOTION FOR JUDICIAL</b>
ROBIN BRYSON, et. al.,	)	<b>NOTICE</b>
	)	
Defendant.	)	

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NOW COME DEFENDANTS Robin Bryson, Mission Hospital, Inc. and ANC Healthcare, Inc. (collectively herein “these Mission Defendants”) and respond to Plaintiff’s Motion for Judicial Notice (hereinafter “Plaintiff’s Second JN Motion”) by showing unto the Court the following:

**Requested Fact #1:** No objection.

**Requested Fact #2:** No objection.

**Requested Fact #3:** No objection.

**Requested Fact #4:** No objection.

**Requested Fact #5:** No objection.

**Requested Fact #6:** Objection. This requested fact is a mischaracterization of 8 FAM 403. However, given the Court’s suggestion in that Order entered on

April 6, 2020 (Doc. 44) that additional submissions regarding the Plaintiff's name may be better addressed in person at the upcoming hearing, these Mission Defendants will wait until the hearing to further address this point.

**Requested Fact #7:** No objection.

**Requested Fact #8:** No objection.

**Requested Fact #9:** No objection.

**Requested Fact #10:** Objection. The final sentence of this requested fact is inaccurately taken out of context by failing to show that such a continuance may be obtained by any of three parties: the Court, Respondents' counsel and the State.

**Requested Fact #11:** No objection.

Respectfully submitted this the 11<sup>th</sup> day of April, 2022.

/ s/ Richard S. Daniels

N.C. Bar No. 8716

*Attorney for Defendants Robin Bryson,  
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Healthcare, Inc.*

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2022, I served the foregoing *Defendants Robin Bryson, Mission Hospital, Inc. and ANC Healthcare, Inc.'s Response To Plaintiff's Motion For Judicial Notice* by electronically filing same with the Clerk of Court using the CM/ECF system and by depositing a copy, contained in a first-class postage-paid wrapper, into a depository under the exclusive care and custody of the United States Postal Service, addressed as follows:

**Bro. T. Hesed-El  
c/o Taqi El Agabey Mgmt.  
30 N. Gould Street, Suite R  
Sheridan, WY 82801**

A courtesy copy will be emailed to the Plaintiff at: [teamwork3@gmail.com](mailto:teamwork3@gmail.com).

This the 11<sup>th</sup> day of April, 2022.

/ s/ Richard S. Daniels  
\_\_\_\_\_  
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